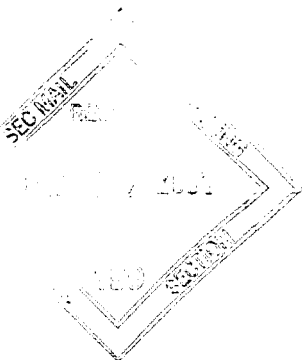


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SEC

MISSION

Washington, D.C. 20549

AB 2/28/06

OMB APPROVAL	
OMB Number:	3235-0123
Expires:	January 31, 2007
Estimated average burden hours per response.....	12.00

**ANNUAL AUDITED REPORT
FORM X-17A-5
PART III**

SEC FILE NUMBER
8-52987

FACING PAGE

**Information Required of Brokers and Dealers Pursuant to Section 17 of the
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder**

REPORT FOR THE PERIOD BEGINNING 1/1/05 AND ENDING 12/31/05
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER: CONSILIUM PARTNERS, LLC

OFFICIAL USE ONLY

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

FIRM I.D. NO.

399 BOYLSTON STREET

(No. and Street)

BOSTON

MA

02116

(City)

(State)

(Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

MARK DENOMME

617-267-0600

(Area Code - Telephone Number)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

WALSH & INGLE, P.C.

(Name - if individual, state last, first, middle name)

200 HIGH STREET

BOSTON

MA

02110

(Address)

(City)

(State)

(Zip Code)

CHECK ONE:

- ☒ Certified Public Accountant
☐ Public Accountant
☐ Accountant not resident in United States or any of its possessions.

PROCESSED

MAR 28 2006

**THOMSON
FINANCIAL**

Handwritten initials

FOR OFFICIAL USE ONLY

*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e).

SEC 1410 (06-02)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

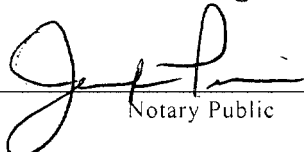
Handwritten initials


OATH OR AFFIRMATION

I, RICHARD BRIGGS, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of CONSILIUM PARTNERS, LLC, as of DECEMBER 31, 2005, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:



JENNIFER PISANO
Notary Public
Commonwealth of Massachusetts
My Commission Expires
September 11, 2009


Notary Public


Signature
Managing Director
Title

This report ** contains (check all applicable boxes):

- ☒ (a) Facing Page.
- ☒ (b) Statement of Financial Condition.
- ☒ (c) Statement of Income (Loss).
- ☒ (d) Statement of Changes in Financial Condition.
- ☒ (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- ☒ (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- ☒ (g) Computation of Net Capital.
- ☒ (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- ☒ (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- ☒ (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- ☒ (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- ☒ (l) An Oath or Affirmation.
- ☒ (m) A copy of the SIPC Supplemental Report.
- ☒ (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

***For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).*

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (B)

Statement of Financial Condition

CONSILIUM PARTNERS, LLC

Balance Sheets
December 31, 2005 and 2004

Assets

	<u>2005</u>	<u>2004</u>
Current assets:		
Cash	\$ 14,967	\$ 78,956
Accounts receivable	1,567	17,209
Prepaid expenses	<u>12,669</u>	<u>16,782</u>
Total current assets	<u>29,203</u>	<u>112,947</u>
Property and equipment, at cost:		
Equipment	62,941	61,258
Leasehold improvements	12,815	12,815
Furniture and fixtures	<u>21,190</u>	<u>19,989</u>
	96,946	94,062
Less: accumulated depreciation	<u>79,525</u>	<u>72,248</u>
Net property and equipment	<u>17,421</u>	<u>21,814</u>
Other assets:		
Rental deposits	<u>16,180</u>	<u>12,135</u>
Total assets	<u>\$ 62,804</u>	<u>\$ 146,896</u>

See accompanying notes to financial statements
and independent auditors' report.

CONSILIUM PARTNERS, LLC

Balance Sheets
December 31, 2005 and 2004

Liabilities and Members' Equity

	<u>2005</u>	<u>2004</u>
Current liabilities:		
Accounts payable and accrued expenses	\$ 5,403	\$ 27,975
Guarantee payments to members payable	<u>3,000</u>	<u>26,175</u>
Total current liabilities	8,403	54,150
Commitments		
Members' equity:		
Members' equity	<u>54,401</u>	<u>92,746</u>
Total liabilities and stockholder's equity members' equity	<u>\$ 62,804</u>	<u>\$ 146,896</u>

See accompanying notes to financial statements
and independent auditors' report.

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (C)

Statement of Income (Loss)

CONSILIUM PARTNERS, LLC

Statements of Loss and Members' Equity Years ended December 31, 2005 and 2004

	<u>2005</u>	<u>2004</u>
Revenues:		
Consulting fees	\$ 783,049	\$ 639,500
Reimbursed expenses	<u>15,540</u>	<u>11,997</u>
Total revenues	<u>798,589</u>	<u>651,497</u>
Cost and expenses:		
Sales and marketing	38,874	46,489
General and administrative	179,677	169,423
Guaranteed payments to partners	<u>618,440</u>	<u>526,625</u>
Total costs and expenses	<u>836,991</u>	<u>742,537</u>
Income (loss) from operations	(38,402)	(91,040)
Other income:		
Interest income	<u>57</u>	<u>236</u>
Net loss	(38,345)	(90,804)
Balance beginning of year	92,746	133,539
Member contributions	<u>0</u>	<u>50,011</u>
Balance end of year	<u>\$ 54,401</u>	<u>\$ 92,746</u>

See accompanying notes to financial statements
and independent auditors' report.

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (D)

Statement of Changes in Financial Condition

CONSILIUM PARTNERS, LLC

Statements of Cash Flows Years ended December 31, 2005 and 2004

	<u>2005</u>	<u>2004</u>
Cash flows from operating activities:		
Net loss	\$ (38,345)	\$ (90,804)
Adjustments to reconcile net income (loss) to net cash used by operating activities:		
Depreciation	7,277	10,546
Loss from sale of investments	0	0
Changes in:		
Accounts receivable	15,642	(3,660)
Prepaid expenses	4,113	8,214
Rental deposits	(4,045)	5,600
Accounts payable	(22,572)	13,150
Guaranteed payments payable	(23,175)	26,164
Net cash provided by operating activities	<u>(61,105)</u>	<u>(30,790)</u>
Cash flows from investing activities:		
Purchase of property and equipment	(2,884)	0
Proceeds from investments	<u>0</u>	<u>0</u>
Net cash provided (used) by investing activities	<u>(2,884)</u>	<u>0</u>
Cash flow from financing activities:		
Payment of distributions payable	0	0
Capital contributions	<u>0</u>	<u>50,011</u>
Net cash provided by financing activities	<u>0</u>	<u>50,011</u>
Decrease in cash	(63,989)	19,221
Cash at beginning of year	<u>78,956</u>	<u>59,735</u>
Cash at end of year	<u>\$ 14,967</u>	<u>\$ 78,956</u>

See accompanying notes to financial statements
and independent auditors' report.

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (E)

Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (F)

Statement of Changes in Liabilities Subordinated to Claims of Creditors

(Not applicable)

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (G)

Computation of Net Capital

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (H)

Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3

(Not applicable)

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (I)

Information Relating to the Possession or Control Requirements Under Rule 15c3-3

(Not applicable)

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (J)

Reconciliation, including appropriate explanation of the Computation of Net Capital
under Rule 15c3-3 and the Computation for Determination of the Reserve Requirements
Under Exhibit A of Rule 15c3-3

(Not applicable)

FORM X-17A-5	FOCUS REPORT
	(Financial and Operational Combined Uniform Single Report)
	Part IIA Quarterly 17a-5(a)
INFORMATION REQUIRED OF BROKERS AND DEALERS PURSUANT TO RULE 17	

COVER

Select a filing method:

Basic ☒ Alternate ☐ [0011]

Name of Broker Dealer: CONSILIUM PARTNERS LLC [0013] SEC File Number: 8- 52947 [0014]
Address of Principal Place of Business: 399 BOYLSTON STREET [0020]
BOSTON MA 02116 Firm ID: 104486 [0015]
[0021] [0022] [0023]

For Period Beginning 10/01/2005 And Ending 12/31/2005
[0024] [0025]

Name and telephone number of person to contact in regard to this report:

Name: Mark S. Denomme [0030] Phone: (617) 267-0600 [0031]

Name(s) of subsidiaries or affiliates consolidated in this report:

Name: _____ [0032] Phone: _____ [0033]

Name: _____ [0034] Phone: _____ [0035]

Name: _____ [0036] Phone: _____ [0037]

Name: _____ [0038] Phone: _____ [0039]

Does respondent carry its own customer accounts? Yes ☐ [0040] No ☒ [0041]Check here if respondent is filing an audited report ☐ [0042]

ASSETSConsolidated ☐ [0198] Unconsolidated ☒ [0199]

	Allowable	Non-Allowable	Total
1. Cash	<u>14,967</u> [0200]		<u>14,967</u> [0750]
2. Receivables from brokers or dealers:			
A. Clearance account	<u></u> [0295]		
B. Other	<u></u> [0300]	<u></u> [0550]	<u>0</u> [0810]
3. Receivables from non-customers	<u></u> [0355]	<u></u> [0600]	<u>0</u> [0830]
4. Securities and spot commodities owned, at market value:			
A. Exempted securities	<u></u> [0418]		
B. Debt securities	<u></u> [0419]		
C. Options	<u></u> [0420]		
D. Other securities	<u></u> [0424]		
E. Spot commodities	<u></u> [0430]		<u>0</u> [0850]
5. Securities and/or other investments not readily marketable:			
A. At cost	<u></u> [0130]		
B. At estimated fair value	<u></u> [0440]	<u></u> [0610]	<u>0</u> [0860]
6. Securities borrowed under subordination agreements and partners' individual and capital securities accounts, at market value:	<u></u> [0460]	<u></u> [0630]	<u>0</u> [0880]
A. Exempted securities	<u></u> [0150]		
B. Other securities	<u></u> [0160]		

7.	Secured demand notes market value of collateral:	<div></div> <div>[0470]</div>	<div></div> <div>[0640]</div>	<div></div> <div>0</div> <div>[0890]</div>
	A. Exempted securities			
	<div></div> <div>[0170]</div>			
	B. Other securities			
	<div></div> <div>[0180]</div>			
8.	Memberships in exchanges:			
	A. Owned, at market			
	<div></div> <div>[0190]</div>			
	B. Owned, at cost		<div></div> <div>[0650]</div>	
	C. Contributed for use of the company, at market value		<div></div> <div>[0660]</div>	<div></div> <div>0</div> <div>[0900]</div>
9.	Investment in and receivables from affiliates, subsidiaries and associated partnerships	<div></div> <div>[0480]</div>	<div></div> <div>[0670]</div>	<div></div> <div>0</div> <div>[0910]</div>
10.	Property, furniture, equipment, leasehold improvements and rights under lease agreements, at cost-net of accumulated depreciation and amortization	<div></div> <div>[0490]</div>	<div>17,421</div> <div>[0680]</div>	<div>17,421</div> <div>[0920]</div>
11.	Other assets	<div></div> <div>[0535]</div>	<div>30,416</div> <div>[0735]</div>	<div>30,416</div> <div>[0930]</div>
12.	TOTAL ASSETS	<div>14,967</div> <div>[0540]</div>	<div>47,837</div> <div>[0740]</div>	<div>62,804</div> <div>[0940]</div>

LIABILITIES AND OWNERSHIP EQUITY

Liabilities	A.I. Liabilities	Non-A.I. Liabilities	Total
13. Bank loans payable	<u> </u> [1045]	<u> </u> [1255]	<u> </u> 0 [1470]
14. Payable to brokers or dealers:			
A. Clearance account	<u> </u> [1114]	<u> </u> [1315]	<u> </u> 0 [1560]
B. Other	<u> </u> [1115]	<u> </u> [1305]	<u> </u> 0 [1540]
15. Payable to non-customers	<u> </u> [1155]	<u> </u> [1355]	<u> </u> 0 [1610]
16. Securities sold not yet purchased, at market value		<u> </u> [1360]	<u> </u> 0 [1620]
17. Accounts payable, accrued liabilities, expenses and other	<u> </u> 8,404 [1205]	<u> </u> [1385]	<u> </u> 8,404 [1685]
18. Notes and mortgages payable:			
A. Unsecured	<u> </u> [1210]		<u> </u> 0 [1690]
B. Secured	<u> </u> [1211]	<u> </u> [1390]	<u> </u> 0 [1700]
19. Liabilities subordinated to claims of general creditors:			
A. Cash borrowings:		<u> </u> [1400]	<u> </u> 0 [1710]
1. from outsiders	<u> </u> [0970]		
2. Includes equity subordination (15c3-1(d)) of	<u> </u> [0980]		
B. Securities borrowings, at market value:		<u> </u> [1410]	<u> </u> 0 [1720]
from outsiders	<u> </u> [0990]		
C. Pursuant to secured demand note collateral agreements:		<u> </u> [1420]	<u> </u> 0 [1730]
1. from outsiders	<u> </u>		

[1000]

2. Includes
equity
subordination
(15c3-1(d)) of

[1010]

- D. Exchange
memberships
contributed for use of
company, at market
value

[1430]

0
[1740]

- E. Accounts and other
borrowings not
qualified for net capital
purposes

[1220]

[1440]

0
[1750]

20.

TOTAL LIABILITIES

8,404

[1230]

0

[1450]

8,404

[1760]

Ownership Equity**Total**

21. Sole proprietorship

[1770]

22. Partnership (limited partners _____
[1020])

54,400

[1780]

23. Corporations:

- A. Preferred stock

[1791]

- B. Common stock

[1792]

- C. Additional paid-in capital

[1793]

- D. Retained earnings

[1794]

- E. Total

0
[1795]

- F. Less capital stock in treasury

[1796]

24.

TOTAL OWNERSHIP EQUITY

54,400

[1800]

25.

TOTAL LIABILITIES AND OWNERSHIP EQUITY

62,804

[1810]

Number of months 3
[3931]

[4200]

NET INCOME

17. Net Income(loss) before Federal Income taxes and items below (Item 9 less Item 16)	<u>-35,537</u>	[4210]
18. Provision for Federal Income taxes (for parent only)	<u>0</u>	[4220]
19. Equity in earnings (losses) of unconsolidated subsidiaries not included above	<u>0</u>	[4222]
a. After Federal income taxes of	<u>0</u>	[4238]
20. Extraordinary gains (losses)	<u>0</u>	[4224]
a. After Federal income taxes of	<u>0</u>	[4239]
21. Cumulative effect of changes in accounting principles	<u></u>	[4225]
22. Net income (loss) after Federal income taxes and extraordinary items	<u>-35,537</u>	[4230]
MONTHLY INCOME		
23. Income (current monthly only) before provision for Federal income taxes and extraordinary items	<u>-10,965</u>	[4211]

EXEMPTIVE PROVISIONS

25. If an exemption from Rule 15c3-3 is claimed, identify below the section upon which such exemption is based

- A. (k) ☐ [4550]
 (1)--Limited business (mutual funds and/or variable annuities only)
- B. (k) ☒ [4560]
 (2)(i)--"Special Account for the Exclusive Benefit of customers" maintained
- C. (k) ☐ [4570]
 (2)(ii)--All customer transactions cleared through another broker-dealer on a fully disclosed basis. Name of clearing firm(s)
- | Clearing Firm SEC#s | Name | Product Code |
|---------------------|----------------|---------------|
| 8- _____
[4335A] | _____ [4335A2] | _____ [4335B] |
| 8- _____
[4335C] | _____ [4335C2] | _____ [4335D] |
| 8- _____
[4335E] | _____ [4335E2] | _____ [4335F] |
| 8- _____
[4335G] | _____ [4335G2] | _____ [4335H] |
| 8- _____
[4335I] | _____ [4335I2] | _____ [4335J] |
- D. (k) ☐ [4580]
 (3)--Exempted by order of the Commission

COMPUTATION OF NET CAPITAL

1.	Total ownership equity from Statement of Financial Condition		54,400	
			[3480]	
2.	Deduct ownership equity not allowable for Net Capital		[3490]	
			54,400	
3.	Total ownership equity qualified for Net Capital		[3500]	
4.	Add:			
	A. Liabilities subordinated to claims of general creditors allowable in computation of net capital		0	
			[3520]	
	B. Other (deductions) or allowable credits (List)			
		[3525A]	[3525B]	
		[3525C]	[3525D]	
		[3525E]	[3525F]	0
				[3525]
5.	Total capital and allowable subordinated liabilities		54,400	
			[3530]	
6.	Deductions and/or charges:			
	A. Total nonallowable assets from Statement of Financial Condition (Notes B and C)	47,837	[3540]	
	B. Secured demand note deficiency		[3590]	
	C. Commodity futures contracts and spot commodities - proprietary capital charges		[3600]	
	D. Other deductions and/or charges		[3610]	-47,837
				[3620]
7.	Other additions and/or credits (List)			
		[3630A]	[3630B]	
		[3630C]	[3630D]	
		[3630E]	[3630F]	0
				[3630]
8.	Net capital before haircuts on securities positions		6,563	
			[3640]	
9.	Haircuts on securities (computed, where applicable, pursuant to 15c3-1(f)):			
	A. Contractual securities commitments		[3660]	
	B. Subordinated securities borrowings		[3670]	
	C. Trading and investment securities:			

1. Exempted securities		[3735]	
2. Debt securities		[3733]	
3. Options		[3730]	
4. Other securities		[3734]	
D. Undue Concentration		[3650]	
E. Other (List)			
	[3736A]	[3736B]	
	[3736C]	[3736D]	
	[3736E]	[3736F]	
		0	0
		[3736]	[3740]
10. Net Capital			5,563
			[3750]

COMPUTATION OF BASIC NET CAPITAL REQUIREMENT

Part A

11. Minimum net capital required (6-2/3% of line 19)	560
	[3756]
12. Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement of subsidiaries computed in accordance with <u>Note(A)</u>	5,000
	[3758]
13. Net capital requirement (greater of line 11 or 12)	5,000
	[3760]
14. Excess net capital (line 10 less 13)	1,563
	[3770]
15. Excess net capital at 1000% (line 10 less 10% of line 19)	5,722
	[3780]

COMPUTATION OF AGGREGATE INDEBTEDNESS

16. Total A.I. liabilities from Statement of Financial Condition	8,404
	[3790]
17. Add:	
A. Drafts for immediate credit	
	[3800]
B. Market value of securities borrowed for which no equivalent value is paid or credited	
	[3810]
C. Other unrecorded amounts (List)	

	[3820A]	[3820B]	
	[3820C]	[3820D]	
	[3820E]	[3820F]	
		0	0
		[3820]	[3830]
19. Total aggregate indebtedness			8,404
			[3840]
20. Percentage of aggregate indebtedness to net capital (line 19 / line 10)		%	128
			[3850]

OTHER RATIOS

21. Percentage of debt to debt-equity total computed in accordance with Rule 15c3-1(d)	%	0
		[3860]

SCHEDULED WITHDRAWALS

Ownership Equity and Subordinated Liabilities maturing or proposed to be withdrawn within the next six months and accruals, (as defined below), which have not been deducted in the computation of Net Capital.

Type of Proposed Withdrawal or Accrual	Name of Lender or Contributor	Insider or Outsider	Amount to be Withdrawn (cash amount and/or Net Capital Value of Securities)	Withdrawal or Maturity Date (MMDDYYYY)	Expect to Renew
[4600]					
	[4601]	[4602]	[4603]	[4604]	[4605]
[4610]					
	[4611]	[4612]	[4613]	[4614]	[4615]
[4620]					
	[4621]	[4622]	[4623]	[4624]	[4625]
[4630]					
	[4631]	[4632]	[4633]	[4634]	[4635]
[4640]					
	[4641]	[4642]	[4643]	[4644]	[4645]
[4650]					
	[4651]	[4652]	[4653]	[4654]	[4655]
[4660]					
	[4661]	[4662]	[4663]	[4664]	[4665]
[4670]					
	[4671]	[4672]	[4673]	[4674]	[4675]
[4680]					
	[4681]	[4682]	[4683]	[4684]	[4685]
[4690]					
	[4691]	[4692]	[4693]	[4694]	[4695]
TOTAL			0		
\$					
			[4699]		
Omit Pennies					

Instructions Detail listing must include the total of items maturing during the six month period following the report date, regardless of whether or not the capital contribution is expected to be renewed. The schedule must also include proposed capital withdrawals scheduled within the six month period following the report date including the proposed redemption of stock and payments of liabilities secured by fixed assets (which are considered allowable assets in the capital computation pursuant to Rule 15c3-1(c)(2)(iv)), which could be required by the lender on demand or in less than six months.

Withdrawal Code	Description
1	Equity Capital
2	Subordinated Liabilities
3	Accruals
4	15c3-1(c)(2)(iv) Liabilities

STATEMENT OF CHANGES

**STATEMENT OF CHANGES IN OWNERSHIP EQUITY
(SOLE PROPRIETORSHIP, PARTNERSHIP OR CORPORATION)**

1.	Balance, beginning of period		89,937
			[4240]
	A. Net income (loss)		-35,537
			[4250]
	B. Additions (includes non-conforming capital of	[4262])	[4260]
	C. Deductions (includes non-conforming capital of	[4272])	[4270]
2.	Balance, end of period (From item 1800)		54,400
			[4290]

**STATEMENT OF CHANGES IN LIABILITIES SUBORDINATED
TO CLAIMS OF GENERAL CREDITORS**

3.	Balance, beginning of period		[4300]
	A. Increases		[4310]
	B. Decreases		[4320]
4.	Balance, end of period (From item 3520)		0
			[4330]

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item K

Reconciliation between the audited and unaudited Statement of Financial Condition with
respect to methods of consolidation

(Not applicable)

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (L)

An Oath or Affirmation

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (M)

Copy of the SIPC Supplemental Report

(Not required as per NASD Regulation letter dated January 4, 2002)

Consilium Partners LLC – 2005 Annual Audit

SEC File Number: 8-52947

Firm ID: 104486

Item (N)

Report describing any material inadequacies found to exist or found to have existed since
the date of the previous audit

(None reported)

WALD & INGLE, P.C.

Certified Public Accountants

200 High Street
Boston, MA 02110

TEL (617) 439-0600
FAX (617) 439-7080

INDEPENDENT ACCOUNTANTS' REPORT

Consilium Partners, LLC
Boston, Massachusetts

We have examined management's assertion included in its representation letter dated January 18, 2006 that Consilium Partners, LLC maintained effective internal control over financial reporting and safeguarding securities as of December 31, 2005.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants and, accordingly, included obtaining an understanding of the internal control structure over financial reporting, testing and evaluating the design and operating effectiveness of the internal control structure, and such other procedures that we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

Because of inherent limitations in any internal control or the practices and procedures referred to above, errors or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

Our consideration of the internal control would not necessarily disclose all matters in the internal control that might be material weaknesses under standards established by the American Institute of Certified Public Accountants. A material weakness is a condition in which the design or operation of one or more of the specific internal control components does not reduce to a relatively low level the risks that errors or fraud in amounts that would be material in relation to the financial statements being audited may occur and not be detected within a timely period by employees in the normal course of performing their assigned functions. However, we noted no matters involving the internal control, including procedures for safeguarding securities, that we consider to be material weaknesses as defined above.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purpose in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures were adequate at December 31, 2005 to meet the SEC's objectives.

This report is intended solely for the use of management, the SEC and other regulatory agencies that rely on rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers and is not intended to be and should not be used by anyone other than these specified parties.

Sincerely,

A handwritten signature in cursive script that reads "Wald & Ingle P.C.".

Wald & Ingle, P.C.
Boston, Massachusetts

January 18, 2006